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~~Michael~~

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**MCDONNELL DOUGLAS**



28 March 1983

Regional Administrator  
U. S. Environmental Protection Agency  
Region VI  
1203 Elm Street  
First International Building  
Dallas, Texas 75270

Regional Administrator  
U. S. Environmental Protection Agency  
Region VII  
324 East Eleventh Street  
Kansas City, Missouri 64106

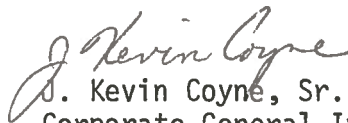
REFERENCE: (a) EPA ID Number MOD000818963 - St. Louis  
(b) EPA ID Number OKD041501347 - Tulsa

Dear Sirs:

The enclosed documents are hereby submitted to comply with the EPA Guidelines published in the Federal Register. The close of McDonnell Douglas Corporation's fiscal year was 31 December 1982.

The enclosed insurance certificate has been previously submitted, thus only a copy is being provided at this time.

Sincerely,

  
J. Kevin Coyne, Sr. Administrator  
Corporate General Insurance

JKC:rjk

RCRA RECORDS CENTER  
R00144195



EPA-ARWM/PMT

MAR 31 1983

Region VII K.C., MO

**MCDONNELL DOUGLAS**



11 March 1983

Regional Administrator  
U. S. Environmental Protection Agency  
Region VI  
1203 Elm Street  
First International Building  
Dallas, Texas 75270

Regional Administrator  
U. S. Environmental Protection Agency  
Region VII  
324 East Eleventh Street  
Kansas City, Missouri 64106

Dear Sirs:

I am the principal financial officer of McDonnell Douglas Corporation, Post Office Box 516, St. Louis, Missouri 63166. This letter is in support of the use of the financial test to demonstrate financial responsibility for liability coverage and closure and/or post-closure care as specified in Subpart H of 40 CFR Parts 264 and 265.

The owner or operator identified above is the owner or operator of the following facilities for which liability coverage is being demonstrated through the financial test specified in Subpart H of 40 CFR Parts 264 and 265:

✓ McDonnell Douglas Corporation  
EPA ID No. MOD000818963  
P. O. Box 516  
St. Louis, Missouri 63166

McDonnell Douglas Corporation  
EPA ID No. OKD041501347  
2000 North Memorial Drive  
Tulsa, Oklahoma 74115

**EPA-ARWM/PMTS**

**MAR 31 1983**

**Region VII K.C., MO**

The owner or operator identified above owns or operates the following facilities for which financial assurance for closure or post-closure care is demonstrated through the financial test specified in Subpart H of 40 CFR Parts 264 and 265. The current closure and/or post-closure cost estimates covered by the test are shown for each facility:

St. Louis Facility  
\$248,200.  
Tulsa Facility  
\$3,434,300

The owner or operator identified above guarantees, through the corporate guarantee specified in Subpart H of 40 CFR Parts 264 and 265, the closure and post-closure care of the following facilities owned or operated by its subsidiaries. The current cost estimates for the closure or post-closure care so guaranteed are shown for each facility:

None

In States where EPA is not administering the financial requirements of Subpart H of 40 CFR Parts 264 and 265, this owner or operator is demonstrating financial assurance for the closure or post-closure care of the following facilities through the use of a test equivalent or substantially equivalent to the financial test specified in Subpart H of 40 CFR Parts 264 and 265. The current closure and/or post-closure cost estimates covered by such a test are shown for each facility:

None

The owner or operator identified above owns or operates the following hazardous waste management facilities for which financial assurance for the closure or, if a disposal facility, post-closure care, is not demonstrated either to EPA or a State through the financial test or any other financial assurance mechanism specified in Subpart H of 40 CFR Parts 264 and 265 or equivalent or substantially equivalent State mechanisms. The current closure and/or post-closure cost estimates not covered by such financial assurance are shown for each facility:

None

This owner or operator is required to file a Form 10K with the Securities and Exchange Commission (SEC) for the latest fiscal year.

The fiscal year of this owner or operator ends on December 31. The figures for the following items marked with an asterisk are derived from this owner's or operator's independently audited, year-end financial statements for the latest completed fiscal year, ended December 31, 1982.

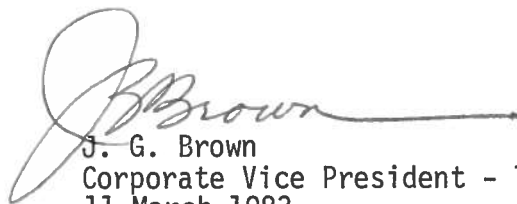
Part B. Closure or Post-Closure Care and Liability Coverage

Alternative I

1. Sum of current closure and post-closure cost estimates (total of all cost estimates listed above)	\$	3,682,500
2. Amount of annual aggregate liability coverage to be demonstrated	\$	2,000,000
3. Sum of lines 1 and 2	\$	5,682,500
* 4. Total liabilities (if any portion of your closure or post-closure cost estimates is included in your total liabilities, you may deduct that portion from this line and add that amount to lines 5 and 6)	\$	2,802,200,000.
* 5. Tangible net worth	\$	1,783,800,000.
* 6. Net worth	\$	1,819,600,000.
* 7. Current assets	\$	3,278,800,000.
* 8. Current liabilities	\$	2,731,900,000.
9. Net working capital (line 7 minus line 8)	\$	546,900,000.
* 10. The sum of net earnings plus depreciation and amortization	\$	395,400,000.
* 11. Total assets in U. S. (required only if less than 90% of assets are located in U. S.)	\$	N/A
	<u>Yes</u>	<u>No</u>
12. Is line 5 at least \$10 million?	X	
13. Is line 5 at least 6 times line 3?	X	
14. Is line 9 at least 6 times line 3?	X	
* 15. Are at least 90% of assets located in the U. S.? If not, complete line 16.	X	
16. Is line 11 at least 6 times line 3?	X	

	<u>Yes</u>	<u>No</u>
17. Is line 4 divided by line 6 less than 2.0?	X	
18. Is line 10 divided by line 4 greater than 0.1?	X	
19. Is line 7 divided by line 8 greater than 1.5?		X

I hereby certify that the wording of this letter is identical to the wording specified in 40 CFR 264.151 (g) as such regulations were constituted on the date shown immediately below.

A handwritten signature in cursive script, appearing to read "J. G. Brown", with a long horizontal line extending to the right.

J. G. Brown  
Corporate Vice President - Treasurer  
11 March 1983

# Ernst & Whinney

10 Broadway  
St. Louis, Missouri 63102

314/231-7700

McDonnell Douglas Corporation  
St. Louis, Missouri

We have applied certain procedures, as discussed below, with respect to selected data contained in J. G. Brown's letter dated 11 March 1983 to the Regional Administrators of Regions VI and VII of the U.S. Environmental Protection Agency. These procedures were performed solely for inclusion with this letter referred to above, and our report is not to be used for any other purpose. The procedures we performed are summarized as follows:

- a. We determined that the amounts included in the letter referred to above for Total Liabilities, Tangible Net Worth (Total Assets less Deferred Charges and Total Liabilities), Net Worth, Current Assets, Current Liabilities, Net Working Capital (Current Assets less Current Liabilities) and Net Earnings plus Depreciation and Amortization were in agreement with or derived from the 31 December 1982 Audited Consolidated Financial Statements of McDonnell Douglas Corporation.
- b. We determined that the assets located in the United States which were included in the Consolidated Balance Sheet of McDonnell Douglas Corporation as of 31 December 1982 exceeded 90% of total assets at that date.

Because the above procedures do not constitute an examination in accordance with generally accepted auditing standards, we do not express an opinion on any of the accounts or items referred to above. No matters came to our attention that caused us to believe that the specified data should be adjusted. This report relates only to the accounts and items specified above and does not extend to any financial statements of McDonnell Douglas Corporation taken as a whole.

*Ernst & Whinney*

St. Louis, Missouri  
11 March 1983

CERTIFICATE OF INSURANCE

No. 46

Date 03 August 1982

CERTIFICATE ISSUED TO

NAMED INSURED AND ADDRESS

United States Environmental Protection  
Agency  
Region VII  
324 East Eleventh Street  
Kansas City, Missouri 64106

MC DONNELL DOUGLAS CORPORATION  
AND ANY OF ITS DIVISIONS OR  
SUBSIDIARY COMPANIES  
POST OFFICE BOX 516  
ST. LOUIS, MISSOURI 63166

This is to certify that the Central National Insurance Company of Omaha has issued to the Named Insured, insurance affording coverage as indicated below.

THIS CERTIFICATE OF INSURANCE NEITHER AFFIRMATIVELY NOR NEGATIVELY AMENDS, EXTENDS OR ALTERS THIS COVERAGE AFFORDED BY ANY POLICY DESCRIBED HEREIN.

KIND OF INSURANCE	POLICY NUMBER	COMPANY	POLICY PERIOD	LIMITS OF LIABILITY
Comprehensive General Liability-Products Completed Operation (Excluding Aircraft Products), Contractual Liability, Comprehensive Automobile Liability.	CNS 13-30-35	Central National Ins. Co. of Omaha	8/1/82 to 8/1/85	\$2,000,000. Each Occurrence Single Limit Bodily Injury and Property Damage \$2,000,000. Annual Aggregate

SEE ATTACHED ADDENDUM

In the event of any material change in, or cancellation of, said policies, the company(s) will give 30 Days written notice to the party to whom this certificate is issued, but failure to give such notice shall impose no obligation nor liability upon the company.

*William A. Lawrence, Jr.*  
William A. Lawrence, Jr., Vice President

ADDENDUM #1 TO  
CERTIFICATE OF INSURANCE  
#46  
DATED 8/3/82

1. The Central National Insurance Company, the Insuror, of 3580 Wilshire Boulevard, Los Angeles, California 90010, hereby certifies that it has issued liability insurance covering bodily injury and property damage to McDonnell Douglas Corporation, the Insured, of P. O. Box 516, St. Louis, Missouri 63166, in connection with the Insured's obligation to demonstrate financial responsibility under 40 CFR 264.147 or 265.147. The coverage applies at the Tulsa Facility, EPA I.D. No. OKD041501347, 2000 North Memorial Drive, Tulsa, Oklahoma, and at the St. Louis Facilities, EPA I.D. No. MOD000818963, Tracts I and II, Brown, Lindbergh and Banshee Roads, St. Louis, Missouri 63166, for sudden and accidental occurrences. The limits of liability are \$2,000,000.00 each occurrence and \$2,000,000.00 annual aggregate, exclusive of legal defense costs. The coverage is provided under policy No. CNS 13-30-35 issued on August 1, 1982. The effective date of said policy is August 1, 1982.
2. The Insuror further certifies the following with respect to the insurance described in Paragraph 1:
  - a) Bankruptcy or insolvency of the insured shall not relieve the insuror of its obligations under the policy.
  - b) The Insuror is liable for the payment of amounts within any deductible applicable to the policy, with a right of reimbursement by the Insured for any such payment made by the Insuror. This provision does not apply with respect to that amount of any deductible for which coverage is demonstrated as specified in 40 CFR 264.147 or 265.147.
  - c) Whenever requested by a Regional Administrator of the U. S. Environmental Protection Agency (EPA), the Insuror agrees to furnish to the Regional Administrator a signed duplicate original of the policy and all endorsements.
  - d) Cancellation of the insurance, whether by the Insuror or the Insured, will be effective only upon written notice and only after expiration of sixty (60) days after a copy of such written notice is received by the Regional Administrator(s) of the EPA Region(s) in which the facilities are located.
  - e) Any other termination of the insurance will be effective only upon written notice and only after the expiration of thirty (30) days after a copy of such written notice is received by the Regional Administrator(s) of the EPA Region(s) in which the facilities are located.

ADDENDUM #1 TO  
CERTIFICATE OF INSURANCE  
#46  
DATED 8/3/82

I hereby certify that the wording of this instrument is identical to the wording specified in 40 CFR 264.151(j) as such regulation was constituted on the date first above written, and that the Insuror is licensed to transact the business of insurance, or eligible to provide insurance as an excess or surplus lines insuror, in one or more States.

Signed by: William A. Lawrence, Jr.

William A. Lawrence, Jr.  
Vice President  
Alexander & Alexander, Inc.  
Authorized Representative of  
Central National Insurance Co.  
120 South Central Avenue  
Saint Louis, Missouri 63105